

**City of Seattle**  
**COMPREHENSIVE PLAN AMENDMENT APPLICATION – 2011-2012**

*Date:* May 16, 2011

*Applicant:* Chris Leman

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*Name of general area, location, or site that would be affected by this proposed change in text (attach additional sheets if necessary):* Seattle as a whole, but also all other areas of the world, which in common are affected by changes in climate caused by increases in atmospheric carbon, to which Seattle is a significant contributor.

*Applicant Signature:*

A handwritten signature in black ink that reads "Chris Leman". The signature is written in a cursive, flowing style.

*Date:* 5/16/11

Attachment A

## **REQUIRED QUESTIONNAIRE: Comprehensive Plan Amendment Application**

*Please answer the following questions in text and attach them to the application. Supporting maps or graphics may be included. Please answer all questions separately and reference the question number in your answer. The Council will consider an application incomplete unless all the questions are answered. When proposing an amendment, you must show that a change to the Comprehensive Plan is required.*

*1. Provide a detailed description of the proposed amendment and a clear statement of what the proposed amendment is intended to accomplish. Include the name(s) of the Comprehensive Plan Element(s) (Land Use, Transportation, etc.) you propose to amend.*

In the Transportation element, after the existing language of Transportation Goal TG-11, add the following new Transportation Goal: "To help realize goals and policies in the Environmental Element to reduce emissions of climate-changing greenhouse gases, and realize transportation goals and policies in this Element, the annual per capita vehicle miles traveled within, to, or from Seattle will be reduced by at least eighteen percent by 2020, thirty percent by 2035, and fifty percent by 2050. As provided in the Environmental Element, the Climate Action Plan will establish specific vehicle miles traveled reduction goals by transportation mode or sector."

Explanation. According to the Puget Sound Regional Council and the Stockholm Environmental Institute/Cascadia/ICF team, in 2008 there were 3.766 billion vehicle miles traveled (single or high occupancy vehicles, vanpools, and light trucks) in Seattle, a number projected to increase to 4.017 billion in 2020, 4.191 billion in 2030, and 4.468 billion in 2050. Comprehensive Plan Goal EG-7 commits Seattle to reduce carbon dioxide and other climate-changing greenhouse gases 30 percent by 2024 and 80 percent by 2050. Transportation Policy T-17 directs the City to "provide, support and promote programs and strategies aimed at reducing the number of car trips and miles driven (for work and non-work purposes) to increase the efficiency of the transportation system, and reduce greenhouse gas emissions." Unfortunately, Goal EG-7 and Policy T-17 do not contain numerical targets for reducing vehicle miles traveled, Seattle's largest and growing source of carbon emissions. The targets proposed here (at least eighteen percent by 2020, at least thirty percent by 2035, and at least fifty percent by 2050) are the same as (or, if the City chooses to go further, more than) the reduction that has been required by state law since June 2008 (Revised Code of Washington 47.01).

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The Department of Planning and Development supported a Comp Plan amendment proposed in 2010 that would have committed Seattle to "meet or beat" the Washington's statewide VMT reduction goals. On August 2, 2010, the City Council passed Resolution 31233 which directed study of that proposed amendment and reserved the City Council's right to present its own "placeholder" to "establish a numerical target for reduction in vehicles miles traveled." The City Council never produced such a placeholder. Instead, in April 2011 via Ordinance 123575, the City Council adopted a policy for the Comprehensive Plan's Environmental Element stating that "The Climate Action Plan will identify strategies for reducing greenhouse gas emissions in the transportation, building, energy, and waste sectors, including establishing vehicle miles traveled reduction goals by transportation mode or sector." Note that in taking this action, the City Council failed to commit to "meet or beat" the numerical goals that Washington State has had by law since 2008; even a negligible VMT reduction goal in the Climate Action Plan (and with no deadline set by the Council for doing so) would satisfy the City Council's 2011 amendment to the Comprehensive Plan.

The Comprehensive Plan still lacks any provision actually committing Seattle to reducing vehicle miles traveled by any amount, and especially lacks any commitment to "meet or beat" the numerical reductions that Washington state has had by law since 2008. Unlike the Climate Action Plan, which can be repealed or weakened at will, the Comprehensive Plan is adopted by City ordinance and, according to state law, can be changed only once a year, and only through a process that is not arbitrary or capricious, with the public being given notice and allowed to speak on the changes at a hearing.

*2. Describe how the issue is currently addressed in the Comprehensive Plan. If the issue is not adequately addressed, describe the need for it.*

As outlined above, the Comprehensive Plan Environmental Element has specific goals for reducing greenhouse gases 30 percent by 2024 and 80 percent by 2050. However, to help implement these numerical goals, the Plan's Transportation Element lacks similarly specific numerical goals for reducing vehicle miles traveled. Washington State since 2008 has by law had such numerical VMT reduction goals.

Ordinance 123575 changed the Comprehensive Plan to assign to Seattle's Climate Action Plan the establishment of vehicle miles traveled reduction goals by transportation mode or sector. However, nothing in the Comprehensive Plan actually commits the City to any actual VMT reductions, whether in an overall amount or by transportation mode or sector. The lack of such a provision in the Comp Plan weakens the Climate Action Plan. Until the

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Comprehensive Plan contains such a numerical commitment, Seattle will never realize its hopes of a dramatic reduction in greenhouse gases, which instead will continue to increase.

While it is true that the existing Transportation Goal TG-11 has percentage goals for the SOV and non-SOV modes, it can be easily seen that, even if the Comprehensive Plan successfully shifts mode choice away from single occupancy and car-pool travel, the currently projected increases in vehicle miles traveled can easily overwhelm any greenhouse gas reductions that may result from a shift in mode choice. Even with the desired shifts in mode choice, increases in vehicle miles traveled could produce an ongoing increase in greenhouse gases. Shifts in mode choice are needed, but to succeed as a greenhouse gas reduction strategy, they must be done in partnership with quantified goals for reductions in vehicle miles traveled.

Yes, there are hopes for making internal combustion engines more efficient, for more combustion engines to be combined with hybrid electric power, for natural gas and biofuels to replace gasoline and diesel, for vehicles to be powered by fuel cells and hydrogen, and for plug-in electric vehicles. But technology and the infrastructure will not move fast enough to reverse Seattle's increasing contribution to greenhouse gases from the growth in vehicle miles traveled.

Even as vehicles become available that do not emit greenhouse gases, the political pressures will be irresistible to allow the more carbon-emitting vehicles to continue to operate. Such has been the case with motor vehicle emissions controls. And City Light has estimated that if all motor vehicles in Seattle were electric, it would require (even aside from future increases in vehicles and VMT) a substantial increase in electricity demand. It will be difficult to supplying that increase without increasing atmospheric carbon. There is no substitute for Seattle substantially reducing its vehicle miles traveled.

*3. Describe why the proposed change meets the criteria adopted in Resolution 30662 for considering an amendment to the Comprehensive Plan. The criteria are listed at the end of this application form. Is a Comprehensive Plan amendment the best means for meeting the identified public need? What other options are there for meeting the identified public need?*

For the numerical greenhouse gas reduction goals in the Environmental Element of the Comprehensive Plan and for the Climate Action Plan's establishment of "specific VMT reduction goals" (not required to be numerical!) by transportation mode or sector to have any weight behind them, the Comprehensive Plan needs to set a numerical goals for reducing vehicle miles

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traveled. The Comp Plan is “where the rubber meets the road,” and so far it does not seriously commit the City to “meet or beat” the numerical state VMT reduction goals.

It is now more three years since the legislature and governor by law adopted numerical VMT reduction targets, and no jurisdiction more than Seattle should have its own targets that are at least as tough. Just as are already in state law, Seattle's Comprehensive Plan needs numerical goals for the reduction of vehicle miles traveled--and the City should adopt numbers that are equal to or more aggressive than the state numbers.

*4. What do you anticipate will be the impacts caused by the change in text, including the geographic area affected and the issues presented? Why will the proposed change result in a net benefit to the community?*

The proposed amendment will help turn around the ongoing increase in vehicle miles traveled that is Seattle's worst contribution to global warming. This result will benefit the globe, and especially the impoverished nations that are completely blameless in the global increases in atmospheric carbon. It will also show that the City means what it says about wanting to reduce its carbon footprint.

Including VMT reduction mode choice allocations in the Climate Action Plan or the Transportation Strategic Plan is not, alone, a suitable substitute to putting an overall numerical VMT reduction goal in the Seattle Comprehensive Plan. Procedures for adopting, revising, and implementing the Climate Action Plan and the Transportation Strategic Plan are notoriously lax, with none of the procedural protections that apply to the Comprehensive Plan. Only the Comprehensive Plan is governed by state law, the Growth Management hearings boards and the courts, and only it has strong requirements for public notice and comment and against changing it more than once a year.

If this amendment is not adopted, the climate-induced damage to people and nature throughout the world to which Seattle is contributing will only worsen. Failure to meet or beat the state's numerical goals for reduction of vehicle miles traveled amounts to “fiddling while Rome burns.” Adopting this amendment will place Seattle on the right side of history.

*5. How would the proposed change comply with the community vision statements, goals, objectives, and policies of the Comprehensive Plan? Please include any data, research, or reasoning that supports the proposed amendments.*

This revision to Transportation Goal TG-11 will lend on-the ground meaning to the Comprehensive Plan's Environment and Transportation elements. EPA's estimate is that 27 percent of greenhouse gas emissions nationwide come from the transportation sector, and that this proportion is growing. The percentage contribution of the transportation sector is higher in the Northwest and especially the Puget Sound region because the contribution of the electric power industry to greenhouse gas emissions is so much less here. The proportion of this region's greenhouse gas emissions attributable to the transportation sector is growing faster than for any other sector.

*6. Is there public support for this proposed text amendments (i.e. have you conducted community meetings, etc.)? Note: The City will provide a public participation process, public notice, and environmental review for all applications.*

To great acclaim, the Governor and state legislature agreed on a similar measure (H.B. 2815, RCW 47.01) in 2008 in Olympia. People in Seattle will support this change in even greater numbers. Any serious effort to address Seattle's contribution to global warming must reverse and reduce its high and growing vehicle miles traveled. The way to do so is to include a specific commitment in the Comprehensive Plan to “meet or beat” the numerical state VMT reduction goals.